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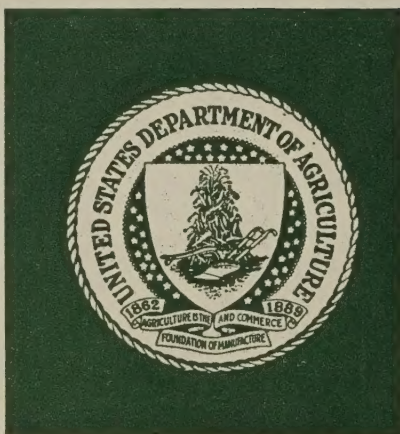
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THE FINAL REPORT
by the
APHIS EVALUATION TASK FORCE
on the
McGREGOR REPORT, "THE EMIGRANT PESTS"
to

Leo G. K. Iverson
Deputy Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

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June 1974

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INTRODUCTION

This is the final report by the Animal and Plant Health Inspection Service (APHIS) Evaluation Task Force in response to the Administrator's charge to review "The Emigrant Pests" by Dr. Russell C. McGregor. "The Emigrant Pests" is a report of an indepth task force study of certain aspects of agricultural quarantine inspection activities. The McGregor Report was released in August 1973. The APHIS Committee was selected in September 1973, and instructed to consider the McGregor report, along with other relevant information, and submit recommendations to improve procedures and operations within PPQ.

The APHIS report follows the format and numbered recommendations used in Chapter 8, "Conclusions and Recommendations," of "The Emigrant Pests." Four additional recommendations were added by the APHIS committee. A majority of the McGregor recommendations are currently in use, but generally, to a limited degree. Efforts should be greatly intensified and a policy of complete commitment must be adopted upon acceptance of the APHIS report.

"The Emigrant Pests" may be used as a supplement to the APHIS report. This suggestion is made because the explanations and background information contained in the McGregor report are helpful for a better understanding of the McGregor recommendations which are expanded or modified in the APHIS report.

Each recommendation in the APHIS report follows the same format. "A Background and Current Status" statement is presented first. This is followed by the recommendations. Some recommendations contain several parts. Implementation dates are given for these recommendations that require a time element to develop. Recommendations or parts of recommendations not containing specific implementation dates should be given a high action priority as soon as they are formally accepted.

RESPONSIBILITY OF THE DEPUTY ADMINISTRATOR (DA)

The recommendations of this committee should be modified or rejected in a timely fashion. The DA should use the full weight of his office to insure that adopted recommendations are implemented. He should identify the individuals and/or organizational elements in PPQ responsible for the implementation of each recommendation accepted. Each designated individual or organizational element should be required to report to the DA his progress in implementation not later than one year from the date of acceptance of the relevant recommendation and at suitable periods thereafter until the objectives are satisfied.

Much time and money have been spent by the McGregor and APHIS task forces in:

1. Reviewing and evaluating this country's programs for preventing the introduction of exotic animal diseases and plant pests.

2. Analyzing the threat these pests and diseases pose to the environment and agriculture of the United States.

3. Recommending new or revised strategies and concepts for protection against such pests and diseases. The APHIS committee has faith that these efforts will not be set aside or forgotten through lack of interest and commitment.

OUTLINE OF REPORT

- 81.1 Emphasize Global Movements of Pests and Diseases
- 81.2 Adopt Balanced Objectives
- 81.3 Concentrate on Highest Risks
- 81.4 Reduce Biological Uncertainties
- 81.5 Emphasize Compliance
- 81.6 Encourage Private Efforts
- 81.7 Establish Risk Standards
- 81.8 Provide Evaluation
- 81.9 Involve State Regulatory Organizations

- 82.1 Develop a Source Inspection System
- 82.2 Revise Program Strategies
- 82.3 Monitor Customs' Baggage Seizures
- 82.4 Continue Mexican Border Inspection of Passenger Vehicles
- 82.5 Intensify Enforcement of Germ Plasm Traffic Regulations
- 82.6 Develop a Pan American Quarantine Organization
- 82.7 Information Storage, Retrieval, and Analysis System
- 82.8 Greater Use of Compliance Agreements for Aircraft Clearance

- 83.1 Review and Streamline Regulations
- 83.2 Develop More Uniformity of Inspection Procedures
- 83.3 Employ Statistical Sampling
- 83.4 Stress The Use of New Detection and Control Devices
- 83.5 Test Pathway Survival
- 83.6 Establish Administrative Penalties

81.1 EMPHASIZE GLOBAL MOVEMENTS OF PESTS AND DISEASES

Background and Current Status:

"Emphasize Global Movements" refers to the principle that control of plant and animal pests and diseases within a country is one of the best safeguards against their movement in international trade and their spread to other countries. Although this principle is generally accepted worldwide by plant protection officials, the practical application is very slow.

The United States:

1. Is an active member of the International Plant Protection Convention (IPPC) and two regional Foreign Agriculture Organization (FAO) affiliates--the Caribbean Plant Protection Commission (CPPC) and the North American Forestry Commission (NAFC).

2. Participates as an observer in other regional plant protection organizations.

3. Carries out preclearance of commodities, baggage, retrograde cargo, and carriers on request.

4. Participates in a number of formal and informal agreements with certain foreign countries covering approval of foreign meat processing establishments and animal and plant pest and disease eradication and suppression programs in foreign countries.

5. Currently is working out arrangements with Canada and Mexico to establish a regional organization to be known as the North American Plant Protection Organization (NAPPO).

The United States must accelerate its efforts in striving to meet the long-range international objective of stopping global movement of plant and animal pests and diseases. Such efforts would include an intensive commitment of cooperation and coordination with foreign nations in combination with expanded pest and disease detection and control programs within the United States.

Recommendations:

1. Support and promote among nations the importance of more uniformity in plant and animal import requirements and methods of commodity inspection.

2. Support and promote among exporting countries the need to accept full responsibility that only pest and disease-free commodities are exported.

3. Strengthen measures against foreign shippers and countries exporting products to the United States not meeting plant and animal import requirements as certified. Such measures could include:

a. Removal of foreign establishments from lists of establishments approved to process and handle plant and meat products entering the United States.

b. Requiring immediate reexport of infested or contaminated commodities in lieu of treatment or cleaning.

c. Requiring mandatory treatment of specific products.
IMPLEMENTATION DATE: July 1, 1975.

4. Encourage development of a complete exchange program of pest information between neighboring countries and call for full participation in a worldwide exchange of pest information under the IPPC framework.

5. Extend to State plant protection officials formal invitations to participate in international phytosanitary conventions and meetings by designating a representative of the State's plant regulatory board to attend specific international meetings as a member of the U.S. delegation. IMPLEMENTATION DATE: January 1, 1975.

6. Agree that each major new policy and procedure of the plant and animal programs of the U.S. must be routinely reviewed to assure that the international ramifications have been considered and international opportunities have been utilized.

7. Establish overseas positions for U.S. phytosanitary officials to assist exporting countries in meeting U.S. import requirements. Such assignments could be limited to principal regional export areas of the world. Consideration could be given to sharing the workload with Canada which is considering a similar type of program in Europe. Workload could also be coordinated and shared with the U.S. Meat and Poultry Inspection (MPI) and Veterinary Services (VS) Programs personnel now assigned to European areas. To assure earliest implementation of this proposal, consideration could be given to arranging for the U.S. bulb inspector in charge residing in the Netherlands to carry out the functions of this position on a part-time basis to determine feasibility of such a program. IMPLEMENTATION DATE: Fiscal Year 1975.

81.2 ADOPT BALANCED OBJECTIVES

Background and Current Status:

As stated in the McGregor Report, statutory laws are now broad enough to permit complete exclusion of exotic agricultural pests and diseases. However, this has not been possible to achieve with present modes of transportation, trade practices, and available resources. The legal authority in many instances also permits the application of restrictions. Restrictions based on good scientific techniques for the alteration of the goods and accompanied by well-designed sampling schemes can be an extremely powerful approach in achieving an adequate level of protection.

Recommendation:

The following objective is recommended as an aid in developing a more realistic understanding of the program and as a guideline for establishing more meaningful goals in pest protection:

"The objective of plant and animal quarantine programs should be to provide adequate protection to the plant and animal resources of the Nation while avoiding unnecessary restrictions on international trade and commerce. This will be done by appropriate inspection at ports of entry, mandatory treatment as a condition of entry when warranted, maintaining an active National survey and detection system, encouraging shipments of clean cargo, fostering preclearance at source, and by excluding or restricting foods, materials, or carriers as necessary to prevent the entry of those exotic plant and animal pests and diseases expected to be of economic significance."

81.3 CONCENTRATE ON HIGHEST RISKS

Background and Current Status:

The APHIS committee recognizes the extreme importance of this principle, but believes the McGregor ranking system to be inadequate. An informal ranking system is presently in effect which differs substantially in basics and results from the McGregor system. Both suffer from a lack of accurate and definitive criteria to measure pest risks. An effective ranking system will readily define pest risks and allow the program to evaluate manpower and program defense effectiveness at any program site.

Recommendations:

1. A "top 100" ranking of potential plant pests and animal diseases not occurring in the United States should be developed. Prior to developing such a list, scientifically defensible criteria should be established. Consideration should be given to host and frequency of importation into the United States, commodity pathway, pure "hitchhikers," world distribution, life cycle, seasonal trends, population trend, weather requirements in country of origin, and interception frequency in the United States. The ranking system should also consider risk as it applies to geographical variation in the United States.

2. An additional list of lesser economically important pests also should be defined. These lesser important pests would be those that occur on crops of limited importance, but have considerable economic influence on a local or isolated U.S. environment.

3. It should be understood that such a ranking system will not identify those pests which are considered insignificant in their foreign environment, but could become important in a new ecological niche.

4. That the ranking of plant pests and animal diseases be on separate lists.

5. That as animal diseases and plant pests are identified for ranking, this information be communicated immediately to PPQ field personnel and State officials.

6. That biological data be developed for each pest as it is identified with distribution to the PPQ field personnel and State officials.

7. That a staff group be selected to develop criteria, ranking, and biological data. Specialists are to be included on the work group. IMPLEMENTATION DATES: Staff should be named by July 1, 1974. Ranking criteria should be developed by August 1, 1974. Partial lists of the "top 100" plant pests and animal diseases with biological data should be completed by January 1, 1975. It is recognized that ranking will be a long-term task.

81.4 REDUCE BIOLOGICAL UNCERTAINTIES

Background and Current Status:

Developing knowledge about exotic plant pests and animal diseases has been an important part of the Plant Protection and Quarantine

Program (PPQ) system. In many cases, the information is inadequate. Also, it has not always been available to the port of entry without initiating considerable communications with the Washington office.

The knowledge is maintained partly by reviewing pertinent foreign and U.S. publications. Such information is evaluated by PPQ and VS technical staffs and disseminated to the field offices. There has been some research on exotic plant pests and animal diseases whenever safeguards can be enforced. Some research on exotic plant pests and animal diseases is conducted at foreign sites with Public Law (P.L.) 480 funds.

Recommendations:

1. That PPQ and VS develop an information system that will expeditiously disseminate technical information about exotic plant pests and animal diseases to field personnel for use in the inspection, treatment, survey, and detection programs. This information should include distribution, host reference, colonization, life history, seasonal data, and feeding habits.
IMPLEMENTATION DATE: January 1, 1975.

2. That PPQ port personnel be directed and encouraged to contribute to this important information-gathering program. This kind of information would relate to seasonal interception trends, inspectional hints, how to look for pests, and other information that only this part of the PPQ program can gather.
IMPLEMENTATION DATE: January 1, 1975.

3. That PPQ develop a formalized nationwide alert system which would communicate instant plant pest and animal disease risks occurring at ports of entry. IMPLEMENTATION DATE: January 1, 1975.

4. That reevaluation be made of those plant pests which PPQ considers to be important or unimportant and for which little or no information is available.

5. That exotic animal disease research work continue to be prohibited within the United States. (Plum Island is exempt.)

6. That exotic plant pest research work performed in the United States require stringent safeguard measures.

81.5 EMPHASIZE COMPLIANCE

Background and Current Status:

The McGregor Report recommends compliance, and not enforcement, as the operating philosophy. Although the deterrent effect that

might be produced by a super informational and educational campaign has a potential for risk reduction, we believe current world travel conditions would not permit 100 percent reliance on this system. Primary emphasis is now placed on enforcement with some compliance through a weak educational program. The educational program is limited by Agency resources and a lack of total commitment.

Recommendations:

1. Develop and emphasize a type of enforcement and penalties procedure that will achieve the objectives of a compliance system.

2. The Department should not make exceptions to regulatory requirements unless technically valid and, if made, should then be equally applicable to everyone.

3. Streamline the prosecution process and provide for administrative penalties.

4. Greatly expand the involvement of the Information Division (INFO) in the further development and redirection of the quarantine program. Through the INFO, involve the U.S. Travel Service, which is well equipped for distribution of informational material. The INFO also should become more forceable in seeking cooperation with Federal, State, and local governments, travel organizations, travel trade organizations, trade union groups, chambers of commerce, civic and professional groups, and international and regional organizations which promote travel and tourism throughout the world.

81.6 ENCOURAGE PRIVATE EFFORTS

Background and Current Status:

We agree with the McGregor Report that protection is a joint public-private endeavor. Considerable effort is now directed to this area. The APHIS information program is presently surveying major travel agencies for distribution of informational material. In addition to the distribution of such material in the United States, there are plans for distribution in foreign countries. Several sets of poster-type displays have been developed. Individual posters are presently displayed in some international airports in the United States.

Requests to airlines for active assistance in distribution of informational materials to individual travelers has not been too successful. It is apparent that such private industry cooperation can only be achieved if there is incentive for its assistance.

Recommendations:

1. Increase budget for more effective informational development. IMPLEMENTATION DATE: July 1, 1975.
2. Investigate possible ways industry can be encouraged and/or required to participate in effectively educating the traveling public to agricultural regulations.

81.7 ESTABLISH RISK STANDARDS

Background and Current Status:

The development of explicit standards delineating how much risk will be tolerated in respect to known economic pests in cargoes, baggage, and carriers has limited acceptance. The technical difficulties in developing risk standards and promoting acceptance of the concept by members of Congress, Federal and State regulatory officials, and representatives of industry becomes a very difficult undertaking. Much scientific data is required. The risk-standard concept is less acceptable in the case of animal products due to the nature of the disease organisms involved. The concept is currently applied on a limited basis.

Recommendations:

1. Expand development of risk standards on a biologically sound basis where practicable and justifiable.
2. Review present pest data collection systems of PPQ to determine if the systems will provide the information needed to establish pest risk standards. IMPLEMENTATION DATE: July 1, 1975.
3. Determine relationship between numbers of pest interceptions and numbers needed to establish infestations. This is a long-term program in coordination with research institutions.
4. Determine "pathway survival" routes.

81.8 PROVIDE EVALUATION

Background and Current Status:

Surveys and detection methods, such as blacklight trapping, local port surveys, and Mediterranean fruit fly trapping, are being conducted at various ports of entry. This is being handled as part of port-of-entry inspectional activities. Tick surveillance is already an on-going program with VS.

Baggage inspection produces a large number of agricultural contraband seizures. Baggage interceptions amount to approximately 18 per 1,000 passengers, with approximately 60 percent of these found in hand-carried baggage as opposed to hold or checked baggage. Emphasis is continuing to be placed on baggage inspection through cooperative efforts between APHIS and the U.S. Customs Service.

Recommendations:

1. Greatly expand the survey and detection program presently in use in and around international airports and sea-ports, foreign cargo movement and storage areas, border crossings, and other areas considered susceptible to pest establishment. This specific program should overlap or tie-in with the current national survey and detection program which should be considerably expanded.

2. Cooperative efforts with other countries through FAO and other available channels should be initiated in assessing the effectiveness of baggage inspection in providing quarantine protection. No reduction in baggage inspection should be initiated without sufficient supporting evidence. Care should be taken to include countries that are comparable to the United States as far as animal disease occurrence is concerned. These would include Australia, New Zealand, Ireland, and Japan. Similar data on the effectiveness of cargo inspections would be desirable. The initial inquiries are to be forwarded by September 1, 1974. Continuous assessment from new data is needed.

3. Develop procedures to evaluate the effectiveness of the inspectional process at ports of entry.

81.9 INVOLVE STATE REGULATORY ORGANIZATIONS

Background and Current Status:

This recommendation was initiated by the APHIS Task Force. State regulatory organizations, with few exceptions, have not been directly involved to a major degree in the foreign plant and animal quarantine and inspection program. Containerization of ship and air cargoes and the proliferation of international air freight and passenger flights in effect create innumerable ports of entry within this country. To meet this challenge, all of the capacities and expertise, including that of the State regulatory agencies, are needed.

Recommendations:

1. State regulatory expertise and capacity should be considered as part of a total plant and animal protection system within the country. Assignment of responsibilities in survey

and detection, and export inspection, should be made to State regulatory agencies through a Memorandum of Understanding. Assignment of tasks in import inspection are to be made on an individual basis, when appropriate and mutually advantageous.

2. Criteria should be developed for authorization of State regulatory personnel to act for APHIS in relation to both import and export activities.

3. Promote uniformity of response to quarantine situations by utilizing the facilities of the APHIS Training Center at Battle Creek, Michigan, for assisting in the training of State, as well as, Federal personnel. IMPLEMENTATION DATE: July 1, 1975.

82.1 DEVELOP A SOURCE INSPECTION SYSTEM

Background and Current Status:

This is one of the strategies proposed by the McGregor Report to help bring about an international pest control system. Source inspection, as advocated by the McGregor Report, means that the inspections and treatments required by U.S. import regulations would be performed at origin by plant protection officials or private contractors of the exporting country with advice and monitoring by U.S. officials. (Private contractors would be licensed and regulated by the USDA.) The purpose of the source inspection system, Agricultural Source Inspection and Surveillance Technique (ASIST), is to provide incentives for exporters and foreign countries to ship pest-free commodities and to establish sanctions if they do not.

A modified source inspection system has been in limited use for some time. Certification of meat imports from animal disease countries has been given broad authorization by VS. On the plant side, however, the source inspection has been performed only under supervision of PPQ inspectors in the clearance of bulbs, treatment of fruits, and inspection of returning U.S. military movements.

The goal of requiring pest-free cargoes through a source inspection or treatment is an idealistic one, but one that all countries must sooner or later come to grips with. The IPPC, FAO, with 64 members, appears to hold promise since it provides a basis for governments to consider the ASIST approach. The United States, after years of lagging behind, became a member in 1972 and must now take positive actions in the directions for which each contracting government has agreed to make provisions. We must begin to work closely with foreign countries in requiring valid foreign certificates. The FAO can assist in this program.

Recommendations:

The APHIS committee proposes a modified source inspection system. The McGregor Report emphasizes it would be a mistake to minimize the effort required to implement a complete source inspection system. A multitude of problems would have to be investigated and solved. We believe a modified version as a beginning should be considered. There should be a deemphasis on the routine inspection and the monitoring of fumigations and a corresponding emphasis on the use of sound scientific, managerial, and statistical procedures. The recommendations below reflect this modified approach:

1. The modified source inspection system should be implemented on a case-by case basis.
2. That APHIS employees be assigned to countries on a short term to acquaint the foreign officials with U.S. regulations. This would be in addition to any other foreign assignment positions.
3. That sampling at U.S. destinations must be a part of the source inspection system (SIS).
4. That the degree of inspection of sampling of cargoes in the U.S. be reduced when a country can comply fully with this SIS. Monitoring of each shipment may be the only requirement in the United States when approved.
5. That treatments at origin may be performed by private contractors, but supervision and certification will be required by the country-of-origin plant protection officials.
6. That penalties be assessed to certified shipments determined not to be plant pest or animal risk free. The penalty should be severe enough to discourage repeats. There should be a followup system so that the officials in the originating countries will be advised of infractions and deficiencies.
7. That participation by PPQ in the country of origin be one of monitoring only whenever this strategy is implemented in a country.

82.2 REVISE PROGRAM STRATEGIES

Background and Current Status:

Biological principles and information have been utilized within the constraints of the legal framework and the resources available to minimize animal disease and plant pest risk without undue interruption of international trade and travel. Exclusion has

played a role in this activity, but so has compromise. Whether there has been an appropriate balance between the two is somewhat controversial and probably will continue to be. Basic to the development of strategies is adequate knowledge of such factors as disease and pest biology and distribution, commodity and carrier risk, pathways, pathway survival, and eradication and control mechanisms. It is recognized that this type of information must come from research. However, much of it must be currently obtained by extrapolation as opposed to being generated by research specifically designed to provide answers to problems peculiar to the program.

Recommendations:

1. Strategies should receive constant review supported by an ongoing research program directed toward the development of more effective and efficient policies and procedures for preventing the introduction and establishment of exotic pests and diseases. Research funds should be budgeted by APHIS for this purpose and utilized for finance directed research by the Agricultural Research Service (ARS), State experiment stations, or private industry. IMPLEMENTATION DATE: July 1, 1975.

2. Continue to exercise exclusion when:

a. There is no other reliable strategy available.

b. The risk level and the probable impact of pest or disease introduction on the food, forest, and fiber production capability of this country are of such magnitude that any other strategy is untenable.

c. There is persistent pest or disease risk associated with a commodity.

d. There is a persistent lack of cooperation from an exporting country or an importer.

82.3 MONITOR CUSTOMS' BAGGAGE SEIZURES

Background and Current Status:

The agricultural inspector is now participating in baggage inspection by being available in the Customs baggage area on an "on call" standby basis during baggage inspection. When the Customs officer encounters items of agricultural interest, the agriculture inspector responds and handles the material. There is no formal procedure in the current program to measure the effectiveness of Customs' inspection for USDA.

Recommendations:

1. Maintain the agriculture inspectors' participation in baggage inspection. This would preclude mandatory seizures when there is no biological risk.

2. Set up procedures to increase Customs' effectiveness through a monitoring program which would include:

a. High-level meetings to discuss the proposed monitoring program and assess Customs' reaction. It is an important first step to sell the program to Customs and receive full backing of headquarters and Regional officials.

b. Responsible PPQ program staffs and the PPQ liaison officer working to set up procedure with the U.S. Customs Service, including acceptable standards.

c. Strong support from the U.S. Customs Service and Customs inspectors through an understanding of the proposed program and methods for correcting deficiencies when found.

d. USDA should conduct the actual monitoring program.
IMPLEMENTATION DATE: January 1, 1975.

3. Immediate application of Customs fine procedure on a nationwide basis for agricultural materials for false declarations and smuggling attempts.

4. Conduct a review of the baggage operation after the above programs have been implemented to measure the effectiveness.

82.4 CONTINUE MEXICAN BORDER INSPECTION OF PASSENGER VEHICLES

Background and Current Status:

Under the authority of the Mexican Border Act of 1942, USDA inspectors at major border ports actively participate in the inspection of vehicles arriving from Mexico or points south. This inspection is accomplished in cooperation with other Federal Inspection Service (FIS) Agencies. Most activity involves vehicular baggage inspection. Most interceptions of prohibited plant and animal material result from this type of inspection.

Each year there is an increase in the number of vehicles returning from Mexico. Along with this increase, a greater number of vehicles are returning from Central and South American countries via the Pan American Highway. For the past several years, the South-Central Region has kept a record of the number of vehicles entering New Mexico and Texas ports of the United States that originated in Central and/or South American countries. In FY 1971,

754 vehicles were reported and in FY 1972, 1,077 were reported. These totals only indicate the numbers actually reported by Customs and USDA. Mexico provides an avenue for the importation of the African (or Brazilian) bee, Mediterranean fruit fly, Cancrosis "B" disease of citrus, and other pests from Central America and South America. Interceptions of Mexican fruit fly, West Indian fruit fly, avocado pests, citrus blackfly, potato weevil, and potato smut are not uncommon at Mexican border ports. Golden nematode is also confirmed as occurring in Mexico. Interceptions of prohibited animal products, such as pork, poultry, eggs, and live birds, are extremely high. Prohibited meat originating in countries other than Mexico has been intercepted. Smuggling of prohibited agricultural products is not an uncommon practice, particularly when corresponding American food items are high priced or scarce.

Recommendations:

1. Contrary to the McGregor Report, APHIS-PPQ should continue to participate in vehicular secondary baggage inspection. Primary inspection commitments should be reduced to the absolute minimum considered advantageous.
2. Emphasis should be placed on the inspection and examination of vehicles and baggage arriving from the interior of Mexico and Central and South American countries.
3. PPQ inspectors should maintain the independence of inspecting those vehicles which are considered to be of high agricultural risk and coordinate this inspection with Customs and Immigration. Interagency cooperation should be maintained in the PPQ mission by an active and ongoing cross training program.

82.5 INTENSIFY ENFORCEMENT OF GERM PLASM TRAFFIC REGULATIONS

Background and Current Status:

The movement and handling of research organisms can readily become pathways or avenues of entry of dangerous plant and animal pests and diseases unless scientists are aware of regulations, maintain the right attitude, and conduct their research in a competent manner. Adequate regulations for controlling the entry, handling, and maintenance of exotic pests and germ plasm as objects of experimentation are available and in practice. However, due to accelerated world movement of germ plasm and exotic pests and the existence of certain situations relating to handling practices and laboratory facilities, many regulatory procedures need to be corrected or strengthened without delay.

Recommendations:

1. Intensify regulation of plant and plant pest germ plasm through closer supervision and development of more specific procedures.
2. Develop and implement stronger publicity programs for disseminating information pertaining to regulations covering the entry and handling of experimental materials. Information specialists should be utilized in designing more effective public information programs to reach all biological scientists.
3. Reappraise all laboratory facilities and test sites presently in use and establish a monitoring system for each as appropriate. More specific guidelines for handling test materials should be developed for use both by the regulating officials and the scientists.
4. More attention should be given to detecting and investigating possible violations of pest movement regulations. Violations should be publicized. Violators should be prosecuted when the situation merits. Scientists should clearly understand that, as importers of germ plasm, they are accepting responsibility for any adverse economic effects resulting from unauthorized release or accidental escape of regulated material.
5. PPQ field personnel should have closer liaison with universities and other scientific organizations which work with test organisms. Research workers have more incentive to follow proper entry and handling procedures when information and assistance are easily available.

82.6 DEVELOP A PAN AMERICAN QUARANTINE ORGANIZATION

Background and Current Status:

Important plant and animal pests and diseases are known to occur in various South American countries. The northward movement of agricultural commodities from South American countries into or through Central America and Mexico meets little coordinated resistance. Quarantine restrictions are enforced by the various countries without a unified effort. The Brazilian bee, the Mediterranean fruit fly, golden nematode, and foot-and-mouth disease are examples of pests that can move northward and threaten U.S. agriculture. The establishment of a cooperative commission would enhance the effectiveness of efforts to prevent the northward spread of plant and animal pests and diseases which occur in South America. Plant protection officials in Mexico, Canada, and the United States have met several times recently to discuss the establishment of a Pan American quarantine organization. A meeting to formally establish the NAPPO is scheduled for August 1974.

Recommendation:

The United States should strongly assist the officials of Mexico and Canada in moving forward as quickly as possible to initiate the objectives of the proposed NAPPO soon after the commission is established.

82.7 INFORMATION STORAGE, RETRIEVAL, AND ANALYSIS SYSTEM

Background and Current Status:

This recommendation was initiated by the APHIS Task Force. Many operations of PPQ produce information that can be and should be used in decisions made at all levels in PPQ. This situation will be compounded if the recommendations of this committee are accepted. In the past, use of the computers has been haphazard--the Ecological Evaluations Staff is concerned with statistical computations, the Pest Survey and Technical Support Staff is concerned with pest interception reports, and the Methods Development Staff is concerned with pest management reports. Within the last year or so, the computer section of the Management Improvement Division (MID) surveyed the data processing requirements of PPQ.

The pest interception system can adequately produce a yearly report. It requires weeks to extract other valuable information from the files of this system. A system is required that can respond in minutes or hours, rather than in days or weeks. A system that can integrate the information gathered from diverse sources is also required. The system must be oriented to solving the problems of PPQ and not to the interests of computer specialists and other supporting elements. The system must be flexible to meet changing needs over many years. The time or money required for major modifications of a computer system very often can be ill afforded.

Recommendations:

An integrated computerized information storage, retrieval, and analysis system should be developed for PPQ. Note that this proposal extends beyond port inspection operations and into the areas of the domestic programs.

a. Specifications of the needs of PPQ should be developed by PPQ using computer specialists, engineers, and statisticians as consultants. IMPLEMENTATION DATE: January 1, 1975.

b. Specifications for the computer system should be outlined. IMPLEMENTATION DATE: April 1, 1975.

c. The system should be purchased or developed and implemented. (A completion date estimate is not appropriate at this point.)

82.8 GREATER USE OF COMPLIANCE AGREEMENTS FOR AIRCRAFT CLEARANCE

Background and Current Status:

This recommendation was initiated by the APHIS Task Force. Currently there is limited application of compliance agreements with airlines. Present clearance procedures require USDA inspectors to board all arriving foreign flights (except direct arrivals from Canada and precleared flights). They inspect the plane for left-over agricultural material in the galley area and passenger sections. Inspectors remove restricted material to the laboratory for inspection and disposal. Selected flights are inspected for hitchhiking insects, plant residue from cargo shipments, and blood stains. Garbage is removed and destroyed by ground personnel according to established procedures. This operation is monitored by USDA inspectors. Many flights are routinely inspected day after day which present little or no pest risk.

Clearance of aircraft under compliance agreement procedures would be the responsibility of the airline according to the terms of the agreement executed. USDA inspectors would monitor the operation to assure compliance with the provisions of the agreement. The manpower now used for routine boarding of low risk aircraft could be better utilized to check for hitchhiking insects, blood stains, plant residue, etc. Compliance agreements would afford the Inspector in Charge a valuable tool to make more efficient use of his manpower where the greatest risk occurs.

Recommendation:

Actively pursue the application of compliance agreements to aircraft clearance on a selective basis. Guidelines to execute and monitor agreements is to be completed by September 1, 1974.

83.1 REVIEW AND STREAMLINE REGULATIONS

Background and Current Status:

The McGregor Report recommends:

1. That a formalized and regular arrangement for discussion of key problems with industry should be established to advise USDA on the need to revise or adopt new regulations.

2. That a complete review of quarantine regulations should be undertaken which includes explicit judgements about scientific integrity, as well as administrative feasibility, from the point of view of the airlines, shippers, and the general public.

The APHIS committee finds that:

1. Formalized and regular arrangements for discussion of APHIS regulations are currently in practice. These groups, which allow for dialogue between regulators and the regulated, include the following:

a. The National Plant Board Advisory Council (NPBAC), which is composed of representatives from four regional plant boards and the National Plant Board, has the prerogative of inviting representatives from industry, State and Federal regulatory groups, and scientific fields.

b. In-house task forces made up of headquarters staffs and field personnel are assigned indepth review of specific quarantine programs each year. University and extension scientists and administrative persons, State and Federal regulatory and scientific groups, representatives of industry, and others are contacted for input from their respective areas of expertise.

c. The APHIS Regulatory Services Staff, PPQ, and Program Services Staff, VS, make regular reviews of quarantines and related regulations affecting their respective areas of responsibility.

d. Direct communications systems, including the DA's letter, are utilized to keep State plant regulatory officials, industry representatives, and others informed of proposed changes in Federal plant regulations which might affect their States or industry and provide a channel for receipt of their views.

2. There is a need for more frequent complete reviews of all quarantines and related regulations. Lack of resources contributes to this deficiency.

Recommendation:

No change is required in the present systems of discussing regulation problems with industry and State regulatory officials. Regular and complete reviews of all quarantines and related regulations should be intensified as resources improve.

83.2 DEVELOP MORE UNIFORMITY OF INSPECTION PROCEDURES

Background and Current Status:

There are more "established procedures for inspection" than is acknowledged in the McGregor Report. Standard procedures have been developed and implemented for many activities, including

surface vessel boarding, sealing ships' stores, aircraft garbage handling, fruit and vegetable inspection, and bagging inspection. Most inspectors have been through the Training Center and have worked in ports where good inspection procedures are practiced. Training, imagination, innovation, and good common sense lead to good inspection practices. It is recognized that there is a need for improved uniformity in application of inspection practices in several areas of the Program, as well as the initiation of uniform procedures in some inspection areas not now covered. However, uniform inspection procedures should not be regarded as a directive for the use of cookbook methods by inspectors. (This is the method recommended by the McGregor Report.) Uniformity refers to the approach to the problems. It not only allows variation in procedures from port to port, but virtually assures that such rational and administratively approved differences will occur and are to be expected.

Recommendations:

1. The purposes of an inspection action must be established prior to the establishment of an import inspection procedure. Examples of such purposes include information gathering, quality control, and shipment acceptance or rejection. Subordinate to the acceptance of purposes are the development of statistical sampling procedures and biological methodology.

2. Each proposed procedure should be determined to be scientifically, statistically, and operationally rational and should be field tested prior to its final adoption. The establishment of uniform procedures cannot be accomplished overnight. They will have to be introduced over a period of time.

3. A systematic review of procedures should be adopted to keep them current with changing problems. Once established, procedures should not be considered unchangeable when conditions merit change.

4. It is recommended that two specific operational areas should receive immediate attention in the establishment of uniform procedures:

- a. Standardize export certification procedures between regions and ports.

- b. Standardize miscellaneous cargo inspections. A joint effort by PPQ staff including Ecological Evaluation, Methods Development, and Port Operations is needed to develop the necessary cargo inspection standards.

83.3 EMPLOY STATISTICAL SAMPLING

Background and Current Status:

Statistical sampling is required to assure that data observed is representative of the population from which it was taken. Without such representativeness, any resulting policy decision is suspect. The exact procedures used depend upon factors such as the purpose of the inspection, infestation levels considered acceptable, and the odds for being wrong with which one is willing to live. Thus, no general rules can be set. Class-by-class decisions must be made. Under present procedures, little representative sampling of this type is being done in import inspection. A few inroads have been made in inspections covering apple and pear importations and in the detection of animal diseases.

Recommendations:

We agree with the McGregor Report that statistical sampling should be the policy of PPQ and VS inspection systems. Inspectors should be trained to modify established statistical sampling procedures to meet the nuances of conditions encountered in their daily duties.

83.4 STRESS THE USE OF NEW DETECTION AND CONTROL DEVICES

Background and Current Status:

Research and development of new scientific devices which can detect various agricultural contraband, and consequently increase the effectiveness of baggage inspection, are extremely desirable. Contact has been made with the U.S. Customs Service's research personnel involved in developing new detector equipment through PPQ's Liaison Officer to Customs. In 1971, inquiry was made as to the feasibility of using sensing dogs as a means of detecting agricultural contraband. Customs has been successful in using narcotic detector dogs. In January 1972, PPQ and VS representatives recommended that serious considerations be given to procuring two trained dogs and a qualified handler for a pilot project at a central parcel post facility.

Recommendations:

1. Continue to maintain close contact with Customs through the PPQ Liaison Officer to keep abreast of new detection methods developed by that Service.
2. Secure the latest research data from appropriate sources on possible applicability of inspection by use of bioluminescence and spectrometry. The contacts are to be initiated by January 1, 1975.

3. A pilot project involving the use of detector dogs should be initiated and the results evaluated. The arrangements for the training of two trial dogs is to be initiated by January 1, 1975.

4. Studies should be continued with X-ray devices for use in baggage inspection.

5. PPQ should designate an individual to have full responsibility for maintaining a continuing current knowledge of advanced detection technology as it is developed and be alert to all practical applications of such technology toward increasing the effectiveness of baggage inspection. The selected individual should have a strong educational and experience background in physical sciences or engineering. Such designation should be coordinated with all operational, developmental, and evaluation staffs of the Programs.

83.5 TEST PATHWAY SURVIVAL

Background and Current Status:

Present efforts attempt to concentrate foreign plant and animal quarantine resources on those pathways that are thought to provide the greatest risk of entry and establishment of exotic pests. It must be recognized, however, that a 100 percent scrutiny of commodities in those pathways is not being accomplished and is not possible with present resources. A realistic appraisal of possible future resources, a workload inflated by predictable increases in volume, and speed of transportation in world trade and international travel does not suggest that the equation will become more favorable.

It is also evident that, in numerous instances, little is known about actual pathway survival. The choice of pathway for surveillance has been based largely upon the capability of the host, parts thereof, or associated commodities to carry a pest or disease. The wisdom of choice is then validated by lack of known established infestations in the United States. This judgement is made without actually knowing whether the pest would have survived the pathway in the first place.

Recommendations:

1. Design and obtain specific research on the pathway survival of diseases and pests as a continuing function of risk assessment.
IMPLEMENTATION DATE: July 1, 1975.

2. Structure the APHIS budget to provide for obtaining research assistance from ARS, State experiment stations, and private industry. IMPLEMENTATION DATE: FY 1975.



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83.6 ESTABLISH ADMINISTRATIVE PENALTIES

Background and Current Status:

This recommendation was initiated by the APHIS Task Force. Regulatory activities involving the importation of plant and animal products into the United States would be considerably strengthened if arrangements were made to modify the penalty provisions of the Plant Quarantine Act (PQA) and the Federal Plant Pest Act (FPPA) to include civil penalty authority. One of the principal deterrents to enforcement of regulations issued under these acts is the present procedures that must be followed in obtaining criminal penalties for violations. Civil penalty provisions are desirable under certain conditions and would add much impetus to effective plant and animal pest and disease protection procedures.

Recommendation:

Establish civil (administrative) penalty provisions under the PQA and the FPPA and increase fines under the current criminal provisions from \$500 to \$1,000.

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